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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CAROLINE BARKER,

Plaintiff,

v.

LAUREN MCFERRAN, Chairman, National
Labor Relations Board,

Defendant.

CASE NO. 4:23-cv-308-DMR

**STIPULATION TO EXTENSION OF TIME FOR
DEFENDANT'S REPLY**

The Honorable Donna M. Ryu

Pursuant to Civil Local Rule 6-2, the parties to this action hereby stipulate to a three-day extension of time for Defendant to file the reply in support of her motion to dismiss Plaintiff's amended complaint. Defendant will file the reply by April 22, 2024. For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

DATED: April 19, 2024

Respectfully submitted,¹

ISMAIL J. RAMSEY
United States Attorney

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendant

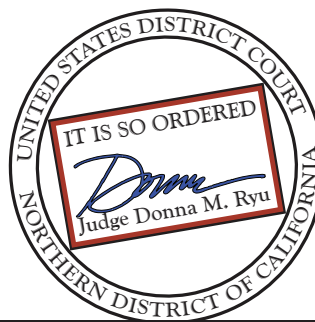
DATED: April 19, 2024

s/ Caroline Barker
CAROLINE BARKER
Plaintiff, *pro se*

ORDER

Pursuant to stipulation, IT IS SO ORDERED. Defendant will file the reply by April 22, 2024.

DATED: April 22, 2024



HON. DONNA M. RYU
United States Chief Magistrate Judge

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On February 12, 2024, the Court granted the parties' stipulation to a proposed briefing schedule for Defendant's motion to dismiss Plaintiff's amended complaint, setting Defendant's reply due date as April 19, 2024. *See* Dkt. No. 55.

3. On April 18, 2024, I contacted Plaintiff regarding Defendant's request for a brief extension of time to prepare the reply, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: April 19, 2024

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney